

**BellSouth Telecommunications, Inc.**

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March 16, 2004

The Honorable Bruce Duke  
Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Analysis of Continued Availability of Unbundled Local Switching for  
Mass Market Customers Pursuant to the Federal Communication  
Commission's Triennial Review Order  
(Docket No. 2003-326-C)

Dear Mr. Duke:

Enclosed for filing are the original and ten copies of BellSouth Telecommunications, Inc.'s First Requests for Admissions, Second Set of Interrogatories, and Second Requests for Production of Documents to AT&T Communications of the Southern States, LLC ("AT&T") in the above-referenced matter.

By copy of this letter, I am serving this discovery on all parties of record as reflected by the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner", with a long, sweeping horizontal stroke extending to the right.

Patrick W. Turner

PWT/nml

Enclosures

PC Docs # 531146

cc: Parties of Record

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2003-326-C**

IN RE:

Analysis of Continued Availability of Unbundled     )  
Local Switching for Mass Market Customers         )  
Pursuant to the Federal Communication             )  
Commission's Triennial Review Order               )  
\_\_\_\_\_)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
FIRST REQUESTS FOR ADMISSIONS, SECOND SET OF INTERROGATORIES AND  
SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to S.C. Code Ann. Regs. 103-851 and Order No. 2003-667, issued in this docket on November 7, 2003, hereby serves its First Requests for Admissions, Second Set of Interrogatories and Second Requests for Production of Documents to AT&T Communications of the Southern States, LLC (hereinafter "AT&T").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its subsidiaries, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to AT&T.

3. "AT&T" means AT&T Communications of the Southern States, LLC, and its subsidiaries, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of AT&T, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope

of these discovery requests any information that would otherwise not be brought within their scope.

9. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

10. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

11. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

12. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;

- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

13. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

14. "Hot cut" refers to the entire process necessary to physically transfer from one carrier to another a working voice grade line or working voice grade loop that remains working after the transfer.

15. "Batch Hot Cut" should be defined consistent with the FCC's use of that term, unless the Interrogatory provides another definition.

16. "Individual Hot Cut" refers to all hot cuts that are not batch hot cuts.

17. "Business case" refers to any undertaking that analyzes or evaluates, among other things, the business value to be realized, the tangible and intangible benefits, the effect on business processes and people's jobs, the financials, the technology to be applied, and the risks, potential problems and rewards of a particular course of action. It is the process that would be undertaken prior to going into a particular business, or before undertaking a particular course of action in order to determine whether the actions taken would provide a positive business benefit, when balanced against the potential problems that might be incurred.

18. "Line" refers to a transmission path between user terminal equipment and a switching center that is used to provide local exchange service.

19. "ILEC" refers to Incumbent Local Exchange Carrier.

20. "Coordinated cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch.

21. "Coordinated time-specific cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

22. "Loop" should be defined consistent with the FCC's use of that term, unless the Interrogatory provides another definition.

23. "DSO" refers to Digital Signal, level zero.

24. "DS1" refers to Digital Signal, level 1.

25. "FCC" refers to the Federal Communications Commission.

26. “UNE” refers to Unbundled Network Element.
27. “UNE-L” refers to Unbundled Network Element-Loop.
28. “UNE-P” refers to Unbundled Network Element –Platform.
29. “MSA” refers to Metropolitan Statistical Area.
30. “Voice-grade equivalent lines” should be defined consistent with the FCC’s use of the term, unless the Interrogatory provides another definition.
31. “Churn” refers to the average monthly outward movement of end user customers expressed as a percentage of total end user customers in service.
32. A “qualifying service” is a service as defined in 47 C.F.R. § 51.5, as that rule is currently set forth in connection with the FCC’s Triennial Review Order (TRO).
33. A “non-qualifying service” is a service as defined in 47 C.F.R. § 51.5, as that rule is currently set forth in connection with the FCC’s Triennial Review Order (TRO).

#### GENERAL INSTRUCTIONS

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
  - a) the privilege asserted and its basis;
  - b) the nature of the information withheld; and
  - c) the subject matter of the document, except to the extent that you claim it is privileged.
2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are

intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent AT&T has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in South Carolina or any other state in proceedings in which BellSouth and AT&T are parties, AT&T need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

#### **INTERROGATORIES AND REQUESTS FOR ADMISSION**

112. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 5, does AT&T contend that it is technically infeasible for its switches to provide qualifying service to end user customers who are located in a wire center in South Carolina not currently



served by AT&T? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents that support this contention.

113. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 11, does AT&T actually provide qualifying service to end user customers in each wire center throughout BellSouth's entire territory using a BellSouth switch either on an unbundled or resale basis?

114. If the answer to the foregoing Interrogatory is in the negative, identify by name, address, and CLLI code each wire center in BellSouth's territory in which AT&T actually provides qualifying service to end user customers in South Carolina using a BellSouth switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the BellSouth exchange in which your end user customer is located.

115. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 19, identify each MSA in South Carolina where AT&T is currently providing a qualifying service to end user customers using UNE-P or resale.

116. Does AT&T currently provide a qualifying service to end user customers outside of the MSAs identified in response to the foregoing Interrogatory or in response to BellSouth's First Set of Interrogatories, Item No. 5, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

117. If the answer to the foregoing Interrogatory is in the affirmative, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you currently provide such qualifying service in South Carolina,

without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

118. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 33, does AT&T provide qualifying service to residential end user customers in South Carolina? If the answer to this Interrogatory is in the affirmative, please identify the product lines that AT&T makes available to South Carolina residential end user customers and provide a breakdown of the total number of AT&T residential end user customers in South Carolina by product line.

119. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 33, please admit that the rates AT&T charges enterprise or small business customers for its LNS product line cover the cost of this service regardless of whether the service is provisioned via UNE-L or UNE-P. If this request is denied, please state all facts and identify all documents that support your denial.

120. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 33, please admit that the rates AT&T charges enterprise or small business customers for its AIO product line cover the cost of this service regardless of whether the service is provisioned via UNE-L or UNE-P. If this request is denied, please state all facts and identify all documents that support your denial.

121. Identify the document excerpts of which were attached in AT&T's response to BellSouth's First Set of Interrogatories, Item No. 46.

122. Identify the document excerpts of which were attached in AT&T's response to BellSouth's First Set of Interrogatories, Item No. 48.

123. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 53, has any ILEC deployed "electronic loop provisioning" ("ELP")? If the answer to this Interrogatory is in the affirmative, identify the ILEC and describe the geographic area in which ELP has been deployed.

124. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 54, describe with particularity the "continuing operational difficulties" allegedly experienced by AT&T with the hot cut process jointly developed by AT&T and BellSouth. In answering this Interrogatory, identify all documents referring or relating to such "continuing operational difficulties."

125. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 54, describe with particularity the "dissatisfaction" allegedly experienced by AT&T customers with the hot cut process jointly developed by AT&T and BellSouth. In answering this Interrogatory, identify all documents referring or relating to such "customer dissatisfaction."

126. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 54, describe with particularity the allegedly "prohibitively high costs" of the hot cut process jointly developed by AT&T and BellSouth. In answering this Interrogatory, identify all documents referring or relating to such "prohibitively high costs."

127. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 54, does AT&T contend that the hot cut process jointly developed by AT&T and BellSouth is not suitable for an "environment without access to local unbundled switching"? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents that support this contention.

128. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 57, state all facts and identify all documents that support AT&T's assertion that the cost of a "fully electronic solution" for individual hot cuts "should be no more expensive than a UNE-P or PIC change."

129. With regard to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 57, what does AT&T estimate would be the cost of deploying a "fully electronic solution" for individual hot cuts in South Carolina and how does AT&T propose that such costs be recovered? In answering this Interrogatory, describe with particularity the basis for AT&T's estimates and the rationale for AT&T's cost recovery proposal.

130. Referring to page 9 of the Direct Testimony of Mark David Van De Water, define "the small business market" that AT&T has served in South Carolina using an unbundled loop from BellSouth with an AT&T owned switch. In answering this Interrogatory, state all facts and identify all documents that support this definition.

131. Referring to page 9 of the Direct Testimony of Mark David Van De Water, identify each business customer in "the small business market" that AT&T has served in South Carolina using an unbundled loop from BellSouth with an AT&T owned switch.

132. For each business customer identified in the foregoing Interrogatory, please state:

1. The number of access lines that AT&T provides to each such customer;  
and
2. The location of the collocation arrangement used to serve each such customer.

133. Referring to page 10 of the Direct Testimony of Mark David Van De Water, identify all documents referring or relating to the “untenable level of customer dissatisfaction” directed at AT&T due to BellSouth’s hot cut process.

134. Referring to page 10 of the Direct Testimony of Mark David Van De Water, state all facts and identify all documents referring or relating to BellSouth’s “substandard performance in returning timely firm order confirmations” for AT&T in South Carolina.

135. Referring to page 10 of the Direct Testimony of Mark David Van De Water, state all facts and identify all documents referring or relating to BellSouth’s “failure to provide a reliable schedule for performing hot cuts” for AT&T in South Carolina.

136. Referring to page 10 of the Direct Testimony of Mark David Van De Water, state all facts and identify all documents referring or relating to BellSouth’s “failure to notify AT&T consistently and timely that customer loops had been transferred” to AT&T in South Carolina.

137. Referring to page 10 of the Direct Testimony of Mark David Van De Water, state the total number of AT&T end user lines in South Carolina that BellSouth has “erroneously disconnected” and identify all documents referring or relating to such erroneous disconnections.

138. Referring to page 10 of the Direct Testimony of Mark David Van De Water, state the total number of AT&T end user lines in South Carolina that BellSouth has “unduly delay[ed]” in reconnecting and identify all documents referring or relating to such delayed reconnection.

139. Referring to page 11 of the Direct Testimony of Mark David Van De Water, identify and describe in detail each database AT&T uses in serving customers via the UNE-L leased from BellSouth.

140. Referring to page 11 of the Direct Testimony of Mark David Van De Water, identify and describe in detail each database AT&T uses in serving customers via the UNE-P leased from BellSouth.

141. Referring to page 11 of the Direct Testimony of Mark David Van De Water, explain with particularity the reason(s) AT&T uses different processes and databases to serve customers via UNE-L as opposed to UNE-P.

142. Referring to pages 11 and 12 of the Direct Testimony of Mark David Van De Water identify every document in AT&T's possession, custody or control referring or relating to AT&T's contention that it does not actively market services to small business mass market customers using a UNE-L strategy due to provisioning problems and the high costs of hot cuts and backhaul costs.

143. Referring to pages 18-19 of the Direct Testimony of Mark David Van De Water, has AT&T calculated the incremental labor costs associated with preparing, tracking, and implementing UNE-L orders? If the answer to the foregoing Interrogatory is in the affirmative, state the results of this calculation, explain with particularity how this calculation was made, and identify all documents referring or relating to such calculation.

144. Referring to page 23 of the Direct Testimony of Mark David Van De Water, identify every document in AT&T's possession, custody or control referring or relating to AT&T's decision in August 2002 to make the request to BellSouth referred to on that page.

145. What was the basis upon which AT&T determined that it wanted to request a process that would allow the conversion of between 100 and 250 lines per central office in a single batch? In other words, what was the factual basis for setting the end points of the range at 100 lines and 250 lines?

146. Referring to page 32 of the Direct Testimony of Mark David Van De Water, has AT&T conducted any analysis, study, or evaluation of “capacity constraints” allegedly associated with BellSouth’s batch hot cut process? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation and identify all documents referring or relating to such analysis, study, or evaluation.

147. Referring to page 52 of the Direct Testimony of Mark David Van De Water, identify each “wholesaler” from whom AT&T is purchasing or could purchase alternative local switching in South Carolina.

148. Referring to page 56 of the Direct Testimony of Mark David Van De Water, has AT&T conducted any analysis, study, or evaluation of the extent to which BellSouth’s network has “insufficient capacity” to handle the changes associated with the migration of customers from UNE-P to UNE-L ? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation and identify all documents referring or relating to such analysis, study, or evaluation.

149. Referring to page 5 of the Direct Testimony of Don J. Wood, identify each CLEC with whom Mr. Wood has worked since 1996 concerning the CLEC’s market entry plan and describe with particularity the nature and extent of Mr. Wood’s work for each such CLEC.

150. Referring to page 5 of the Direct Testimony of Don J. Wood, identify each investor and potential investor for whom Mr. Wood has provided assistance since 1996 concerning their analysis of CLEC business plans and describe with particularity the nature and extent of Mr. Wood’s assistance for each such investor or potential investor.

151. Referring to page 5 of the Direct Testimony of Don J. Wood, describe in detail “the results of the triggers analysis” referenced by Mr. Wood. In answering this Interrogatory,

describe with particularity the “triggers analysis” in South Carolina conducted by, on behalf of, or at the direction of AT&T and identify all documents referring or relating to such analysis.

152. Referring to the Direct Testimony of Don J. Wood, has any analysis, study, or evaluation of the “economic impairment” associated with local switching been conducted by, on behalf, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation and identify all documents referring or relating to such analysis, study, or evaluation.

153. Referring to page 8 of the Direct Testimony of Jay M. Bradbury, state all facts and identify all documents supporting AT&T’s contention that a CLEC must establish a collocation arrangement “in every ILEC wire center in which the CLEC wishes to offer mass market services.”

154. Referring to page 42 of the Direct Testimony of Steven E. Turner, does AT&T contend that LATAs are the appropriate geographic markets that the South Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents that support use of LATAs as the appropriate geographic markets. If the answer to this Interrogatory is in the negative, identify the appropriate geographic market(s) that AT&T contends the South Carolina Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i) and state all facts and identify all documents supporting this contention.

155. Please identify the extent to which Mr. Turner's testimony considers the revenues that a CLEC might be obtain to determine the existence of impairment in any area studied by Mr. Turner.



156. In AT&T's opinion, what are the smallest and largest definitions of a geographic market that the South Carolina Public Service Commission could adopt consistent with the FCC's Triennial Review Order and accepted economic principles? In answering this Interrogatory, provide specific references to the FCC's Triennial Review Order and identify all documents, including, but not limited to, economic treatises, articles, or other literature that support this opinion.

157. Does AT&T make market entry decisions on the wire center level? If the answer to this Interrogatory is in the affirmative, identify all documents referring or relating to market entry decisions made by AT&T on the wire center level.

158. For each wire center in BellSouth's service territory in South Carolina, please provide, the date when AT&T first began offering local exchange service in each such wire center.

159. Has any analysis, study, or evaluation been conducted by, on behalf, or at the direction of AT&T to determine the existence of any cost disadvantage to a CLEC of providing qualifying service via the UNE-L for each wire center in South Carolina? If the answer to this Interrogatory is the affirmative, identify all documents referring or relating to such analysis, study, or evaluation.

160. Has any analysis, study, or evaluation been conducted by, on behalf, or at the direction of AT&T to determine whether a CLEC providing a qualifying service via the UNE-L can make a positive return on investment in any wire center or combination of wire centers? If the answer to this Interrogatory is in the affirmative, identify all documents referring or relating to such analysis, study, or evaluation.

161. Does the fact that the model provided in Steven E. Turner Exhibit SET-2 is set up by LATA indicate that AT&T supports using a LATA to define the geographic market for purposes of this proceeding? If not, why was the LATA used in Mr. Turner's model?

162. In the model provided in Steven E. Turner Exhibit No. 2, state how many CLECs are assumed to serve a given wire center and explain how this assumption is reflected in the market share assumptions in the model.

163. In the model provided in Steven E. Turner Exhibit No. 2, please explain the purpose of the DS0 Impairment Analysis Tool, including, but not limited to, describing how the density zones are defined and explaining how these zones are related to the number of business and residence lines?

164. In the DS0 Impairment Analysis Tool referenced in the Direct Testimony of Steven Turner, please state all facts and identify all documents that support the use of the following default values in the General Inputs section:

- i. Percent of loops greater than 18K feet and percent of loops over 18K feet requiring range extensions.
- ii. Percent of IDLC loops transferable to UDLC or copper.
- iii. Crossover point for enterprise customers.
- iv. Percent of lines above crossover point by UNE zone.
- v. Cost of debt, cost of capital and percent debt in the capital structure.
- vi. Residential and business hot cut costs

165. In the DS0 Impairment Analysis Tool referenced in the Direct Testimony of Steven Turner, explain the basis for the churn rate assumption of 4.6 percent for both business

and residence customers and explain why the same churn rate applies to both residence and business customers.

166. In the DS0 Impairment Analysis Tool referenced in the Direct Testimony of Steven Turner, what is the source of the wire center data on the WC Homing Input tab? Do the line counts include both ILEC and CLEC (UNE-P and UNE-L) lines? Do the business line counts include both large and small businesses?

167. In the DS0 Impairment Analysis Tool referenced in the Direct Testimony of Steven Turner, state all facts and identify all documents that support the labor and materials inputs on tabs DLC Type 1, DLC Type 2 and DLC Type 3.

168. Please explain the purpose of the Facility Ring Processor Tool.

169. In the Facility Ring Processor Tool, please explain how the densities by wire center were derived for the Offices tab. What is their purpose? Where are they used?

170. In the Facility Ring Processor Tool, what are the purposes of the Core Flag, RBOC flag, Tandem Flag, User Exclude CLLI Flag and Automated CLLI Exclude Flag?

171. Please explain the purpose of the Transport Impairment Analysis Tool. How and where is the output used?

172. In the Transport Impairment Analysis Tool, what is meant by "tool handoff"? What is the source of data designated as "tool handoff"?

173. In the Transport Impairment Analysis Tool, how does the economic life of each USOA category compare with forward-looking economic lives established by the FCC and South Carolina Public Service Commission?

174. In the Transport Impairment Analysis Tool, state all facts and identify all documents that support the use of the labor rates and equipment costs on the equipment inputs and fiber structure tabs.

175. In the Transport Impairment Analysis Tool, are the maintenance factors on line 19 of the fiber structure tab monthly or annual amounts?

176. In the Transport Impairment Analysis Tool, state all facts and identify all documents that support the use of the connectivity charges on the alternative connectivity tab.

177. State all facts and identify all documents that support the statement on page 14 of the Direct Testimony of Steven Turner that ILECs incur no costs for number portability. The following interrogatories refer to the Direct Testimony of Steven E. Turner, filed January 29, 2004.

178. In the “WC homing input” tab of the DS0 Impairment Analysis Tool.xls spreadsheet, there are inputs for the “Total Lines”, “Bus Lines”, “Res Lines”, “Special Lines”, “Public Lines”, “Single-Line Bus” and “Households” of each CLLI code identified (columns E through K, respectively).

- (a) Describe with specificity how the CLLI-specific input for “Total Lines” is developed.
  - i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.
  - iii. Provide the answers to 180.a, 180.a.i and 180.a.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 7,015 “Total Lines” associated with the CLLI code ARSNSCAH, LATA

430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.

- (b) Describe with specificity how the CLLI-specific input for “Bus Lines” is developed.
  - i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.
  - iii. Provide the answers to 180.b, 180.b.i and 180.b.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 368 “Bus Lines” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.
- (c) Describe with specificity how the CLLI-specific input for “Res Lines” is developed.
  - i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.
  - iii. Provide the answers to 180.c, 180.c.i and 180.c.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 5,272 “Res Lines” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.
- (d) Describe with specificity how the CLLI-specific input for “Special Lines” is developed.

- i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.
  - iii. Provide the answers to 180.d, 180.d.i and 180.d.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 1,348 “Special Lines” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.
- (e) Describe with specificity how the CLLI-specific input for “Public Lines” is developed.
- i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.
  - iii. Provide the answers to 180.e, 180.e.i and 180.e.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 27 “Public Lines” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.
- (f) Describe with specificity how the CLLI-specific input for “Single-Line Bus” is developed.
- i. Identify the specific algorithms used, if any.
  - ii. Identify each data item and its source.

iii. Provide the answers to 180.f, 180.f.i and 180.f.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 46“Single-Line Bus” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.

(g) Describe with specificity how the CLLI-specific input for “Households” is developed.

i. Identify the specific algorithms used, if any.

ii. Identify each data item and its source.

iii. Provide the answers to 180.g, 180.g.i and 180.g.ii above, with a numerical example from the model. Specifically, demonstrate the development of the 4,023 “Households” associated with the CLLI code ARSNSCAH, LATA 430 – DS0 impairment analysis tool.xls associated with AT&T’s testimony in South Carolina.

179. Describe with specificity the development of the “Percent Lines Above Cross Over (for Enterprise Customers)” inputs on the “general inputs” tab of the DS0 Impairment Analysis Tool.xls spreadsheet and shown below as pulled from the DS0 impairment analysis tool.xls associated with the Direct Testimony of Steven E. Turner in South Carolina

(a) Identify the specific algorithms used, if any.

(b) Identify each data item and its source.

- (c) Demonstrate the above development of this input data for the 69%-72% value identified for UNE Zone 1 and cross over of 11 as highlighted in the table below.



**Cross Over Table When DS-1 are Practical  
(for Enterprise Customers)**

State	Carrier	1	2	3
SC	Southern Bell-SC	11	11	11

**Percent Lines Above Cross Over (for Enterprise Customers)**

UNE Zone			
Lines	1	2	3
1	94%	93%	92%
2	90%	88%	86%
3	88%	85%	83%
4	84%	80%	79%
5	82%	79%	78%
6	80%	76%	75%
7	78%	76%	75%
8	74%	71%	69%
10	72%	70%	69%
12	69%	65%	64%
16	64%	61%	60%
20	59%	58%	54%
24	57%	54%	52%
999	70%	67%	67%

180. Referring to Section I of the Rebuttal Testimony of Jay M. Bradbury, admit that for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger the TRO requires, in part, that the carrier be serving mass market customers in the particular geographic market in question using its own local circuit switches.

181. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

182. Referring to page Section I of the Rebuttal Testimony of Jay M. Bradbury, admit that for the purposes of the FCC's switching impairment analysis, the TRO defines mass market customers as analog voice customers that purchase only a limited number of POTS lines and can only be served via DS0 loops.

183. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

184. Referring to Section I of the Rebuttal Testimony of Jay M. Bradbury, admit that the TRO does not expressly require that, when determining whether a competing carrier is serving mass market customers, the group of mass market customers has to include only residential customers or a combination of residential and business customers, as opposed to business customers alone.

185. If the foregoing Request for Admission is denied, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support such denial.

186. Does AT&T contend that in order for a carrier to qualify as a self-provisioning provider for purposes of the FCC's self-provisioning trigger test the carrier must be serving residential customers? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents, including providing specific references to any and all language in the TRO that support this contention.

187. Assuming that a switch is capable of providing and has sufficient capacity to provide qualifying service to both enterprise and mass market customers, does AT&T contend that there is a technical reason why that switch could only be used to provide qualifying service

to enterprise customers? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents, including applicable technical references that support this contention.

188. Assuming that a switch is capable of providing and has sufficient capacity to provide qualifying service to both enterprise and mass market customers, does AT&T contend that there is a technical reason why that switch could only be used to provide qualifying service to mass market customers? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents, including applicable technical references that support this contention.

189. Please admit that Don J. Wood is not an economist.

190. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

191. Does Mr. Wood claim to be qualified to give an opinion as an expert witness on economic matters? If so, please state all education, training, or experience that qualifies Mr. Wood to render such an expert opinion. In answering this Interrogatory, identify each and every proceeding since January 1, 2000 in which Mr. Wood has been expressly qualified by a court, administrative agency, or hearing tribunal as an expert witness qualified to render an opinion on economic matters.

192. Does Mr. Wood claim to be qualified to give an opinion as an expert witness on the estimation of the cost of capital? If so, please state all education, training, or experience that qualifies Mr. Wood to render such an expert opinion. In answering this Interrogatory, identify each and every proceeding since January 1, 2000 in which Mr. Wood has been expressly qualified by a court, administrative agency, or hearing tribunal as an expert witness qualified to render an opinion on matters involving the estimation of the cost of capital.

193. Does Mr. Wood claim to be qualified to give an opinion as an expert witness on matters involving the depreciation of fixed assets? If so, please state all education, training, or experience that qualifies Mr. Wood to render such an expert opinion. In answering this Interrogatory, identify each and every proceeding since January 1, 2000 in which Mr. Wood has been expressly qualified by a court, administrative agency, or hearing tribunal as an expert witness qualified to render an opinion on matters involving the estimation of the cost of capital.

194. For planning purposes, does AT&T have an expected useful life for its 4ESS or 5ESS switches? If so, what is that useful life?

195. Referring to page 6 of the Rebuttal Testimony of Don J. Wood, please identify the BellSouth witness who argued “that a CLEC utilizing UNEs incurs less risk that (sic) a CLEC investing in its own network....” In answering this Interrogatory, provide specific references to the witness’s testimony where this argument purportedly is made.

196. Referring to page 23 of the Rebuttal Testimony of Don J. Wood, please identify the BellSouth witness who claimed that “a CLEC incurs greater risk when self-provisioning a local circuit switch than when utilizing UNE switching or UNE-P.” In answering this Interrogatory, provide specific references to the witness’s testimony where this claim purportedly is made.

197. Referring to page 7 of the Rebuttal Testimony of Don J. Wood, state all facts and identify all documents that support Mr. Wood’s assertion concerning “frequent crashes” of the BACE model. In answering this Interrogatory, please:

- (a) Define with specificity what Mr. Wood means by “crashes”;
- (b) State whether Mr. Wood checked to ensure that the computer he was using met the computer specifications in the BACE Users Guide?

- (c) For each and every computer used by Mr. Wood that allegedly “crashed,” provide the available memory, approximate free hard drive space, the operating system, and processor type at the time of each such alleged “crash”;
- (d) State whether Mr. Wood completed any runs of the BACE model during which the model did not “crash”; and
- (e) State the number of computers on which Mr. Wood attempted to use the BACE Model.

198. Referring to page 7 of the Rebuttal Testimony of Don J. Wood, identify all documents that support or otherwise refer or relate to Mr. Wood’s assertion that the BACE model “produces different results for otherwise identical runs and where different users operating different computers obtain inconsistent results.”

199. Referring to page 10 of the Rebuttal Testimony of Don J. Wood, wherein he states that “in my experience, CLECs are highly motivated to utilize their own equipment and facilities whenever and wherever feasible,” state all facts and identify all documents that support Mr. Wood’s statement.

200. Does Mr. Wood admit that AT&T takes the position that its network consists of fewer switches and longer loops than BellSouth’s traditionally designed network?

201. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

202. Does Mr. Wood admit that AT&T takes the position that its network design is more “efficient” than BellSouth’s network design.

203. If the foregoing Request for Admission is denied, state all facts and identify all documents that support such denial.

204. With regard to AT&T's marketing offers directed to potential customers of qualifying service, such as its recent offer of \$75 to residential end users to change their local telephone service from their current carrier to AT&T, how does AT&T make the determination about the specific end users to whom such offers will be made? Specifically:

- (a) Does every resident in a subdivision, for instance, get the same offer? If not, how are the subscribers differentiated?
- (b) Does AT&T or its marketing agency use any sort of lists, mechanisms or methods to differentiate between or to actually select the potential customers to whom such offers are made, and if so, explain those in detail.
- (c) Does AT&T extend such offers to every existing telephone service subscriber in a wire center, if it makes the offer to any such subscribers in the wire center? If the answer is no, explain how, if not already provided, AT&T differentiates between such customers in the same wire center.

205. Does Mr. Wood have an opinion whether a BellSouth customer who leaves BellSouth and takes service from a CLEC will purchase more services from the CLEC, less services from the CLEC, or the same services the customer was purchasing from BellSouth? If the answer to this Interrogatory is in the affirmative, describe with particularity Mr. Wood's opinion and state all facts and identify all documents supporting that opinion.

206. Referring to page 40 of the Rebuttal Testimony of Don J. Wood, has any analysis, study, or evaluation of CLEC market share been conducted by, on behalf of, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

207. Referring to page 45 of the Rebuttal Testimony of Don J. Wood, has any analysis, study, or evaluation of CLEC churn been conducted by, on behalf of, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

208. Referring to page 47 of the Rebuttal Testimony of Don J. Wood, has any analysis, study, or evaluation of CLEC service offerings been conducted by, on behalf of, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

209. Referring to pages 50 through 51 of the Rebuttal Testimony of Don J. Wood, has any analysis, study, or evaluation of CLEC sales and customer acquisition costs been conducted by, on behalf of, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

210. Referring to page 51 of the Rebuttal Testimony of Don J. Wood, has any analysis, study, or evaluation of CLEC general and administrative costs been conducted by, on behalf of, or at the direction of Mr. Wood? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

211. Referring to page 50 of the Rebuttal Testimony of Don J. Wood, does Mr. Wood have an opinion whether AT&T is an “efficient” CLEC as that term is used in the TRO? If the

answer to this Interrogatory is in the affirmative, describe with particularity Mr. Wood's opinion and state all facts and identify all documents supporting that opinion.

212. To the extent Mr. Wood claims to be qualified to render an opinion as an expert witness on the estimation of cost of capital, what does Mr. Wood contend should be the correct cost of capital for use in any business case modeling the "efficient" CLEC? In answering this Interrogatory, state all facts and identify all documents supporting Mr. Wood's contention.

213. Referring to page 56 of the Rebuttal Testimony of Don J. Wood, Mr. Wood claims that Dr. Billingsley states that "future CLEC operations, when those CLECs will be incurring the risk to make large fixed investments in network infrastructure, will be less risky than (sic) the current operation of CLECs who rely on UNE switching and UNE-P." Please identify the page and line in Dr. Billingsley's pre-filed testimony where this statement is made. Alternatively, if Mr. Wood has inferred this conclusion from Dr. Billingsley's testimony, please provide a detailed explanation of the basis for Mr. Wood's inference.

214. Does Mr. Wood contend that Dr. Billingsley concluded that the group of CLECs used in Dr. Billingsley's analysis was in fact a group, standing by itself, which was representative of an "efficient" CLEC? If the answer to this Interrogatory is in the affirmative, provide a detailed explanation, including cites to Dr. Billingsley's testimony, that Mr. Wood relies upon to support this contention.

215. Has AT&T or anyone acting at the direction of or on behalf of AT&T made runs of the BACE model? If the answer to this Interrogatory is in the affirmative, please:

- (a) Identify each person involved in making such runs of the BACE model, and, for each such person, state the number of runs of the BACE model he or she



performed, and the number of hours spent in connection with performing such runs;

- (b) Provide in electronic format the BACE Scenario Input files (these are the "ScenarioName"\_Inputs.MDB files in the Scenario directory) used to make such runs of the BACE model;
- (c) For each scenario, provide all changes from the Filed BellSouth BACE scenario "BellSouth\_SC" used in such runs of the BACE model;
- (d) Provide all report files from the BACE model which AT&T claims supports its position in this proceeding that CLECs are impaired without access to unbundled switching from BellSouth, including, for each such file, identifying the scenario used to prepare the file; and
- (e) Provide a description of the steps used to verify or evaluate the BACE model, if any were performed, and identify all documents referring or relating to such verification or evaluation process.

. Do you contend that there are any errors or flaws in the BACE model? If the answer to this Interrogatory is in the affirmative, please state all facts and identify all documents that support this contention. In answering this Interrogatory, please:

- (a) Provide the BACE.Log file found in the root directory of the BACE model from the machine on which the error or flaw was encountered, a log or record of whether the BACE support line was called and informed, a screenshot of the error screen, and a list of the machine's parameters (memory, free hard drive space, Operating system, processor type, etc.); and

- (b) If you did not currently have the BACE.Log file, please provide the memory, approximate free hard drive space at the time, operating system, and process type for the machine(s) on which any error or flaw occurred.

216. Do you contend that any inputs used by BellSouth to the BACE model are erroneous, flawed, or are otherwise inappropriate? If the answer to this Interrogatory is in the affirmative, please:

- (a) Identify each input value that you contend is erroneous, flawed, or inappropriate;
- (b) For each input to the BACE model you contend is erroneous, flawed or inappropriate, state all facts and identify all documents that support this contention;
- (c) Identify each input value that you contend should be used in the BACE model; and
- (d) For each input value that you contend should be used in the BACE model, state all facts and identify all documents that support this contention.

217. Referring to page 18 of the Rebuttal Testimony of Jay Bradbury, wherein he contends “the technology and equipment necessary to implement ELP are available today and are being deployed and used by the ILECs in association with their deployment of DSL services,” state all facts and identify all documents that support this contention. In answering this Interrogatory, identify each ILEC that has deployed ELP technology, state where such technology has been deployed, and describe with particularity how such technology purportedly is being deployed by ILECs, including describing any differences in such DSL deployment with the use of ELP in connection with UNE-L hot cuts.

218. Referring to page 18 of the Rebuttal Testimony of Jay Bradbury, identify with specificity (i.e. by make and model number) the types of equipment Mr. Bradbury contends that the ILECs have deployed that are necessary to implement ELP.

219. Referring to page 9 of the Rebuttal Testimony of Mark Van de Water wherein he lists "proposed advantages" of SBC's hot cut process, does AT&T claim that SBC's hot cut process constitutes an operational impairment to the use of the UNE-L?

220. State all facts and identify all documents that support the contention on pages 11 through 13 of Mark Van de Water's Rebuttal Testimony that BellSouth is not meeting the requirements of the TRO by not allowing cross-connects in South Carolina?

221. State all facts and identify all documents that support the contention on pages 13 through 14 of Mark Van de Water's Rebuttal Testimony that BellSouth's yet-to-be introduced "Special Access product" for cross connections "unnecessarily subjects a non-complex POTS's mass market line to cumbersome procedures such as certification and audits, and irrelevant obligations such as the requirement that the line carry at least 10% interstate traffic."

222. State all facts and identify all documents that support the contention on page 14 of Mark Van de Water's Rebuttal Testimony that BellSouth's yet-to-be introduced "Special Access product" for cross connections "cannot be ordered efficiently."

223. State all facts and identify all documents that support the contention on page 15 of Mark Van de Water's Rebuttal Testimony that "AT&T has attempted to obtain a suitable bulk process from BellSouth to address customer service and cost issues, even with the availability of unbundled switching."

224. State all facts and identify all documents that support the contention on page 21 of Mark Van de Water's Rebuttal Testimony that BellSouth's cutover of over 260 lines in a single

day: (i) "may have been achieved with days of pre-work, around-the-clock scheduling, and other extraordinary means"; and (ii) provides "no indication that the same volume work could be performed in that or any central office on a day-in and day-out basis."

225. If the South Carolina Public Service Commission were to find that CLECs were not impaired without access to unbundled local switching in providing qualifying service to mass markets in certain markets in South Carolina, would AT&T use coordinated or non-coordinated hot cuts in providing service to mass market customers in those markets?

226. Referring to the statement on page 26 of Mr. Van de Water's Rebuttal Testimony that "BellSouth's rates for its batch process are very high," has AT&T performed any study, evaluation, or analysis of the forward-looking costs of a batch hot cut process in South Carolina? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that study, evaluation, or analysis and identify all documents referring or relating to such study, evaluation, or analysis.

227. Referring to page 29 of the Rebuttal Testimony of Mark Van de Water, has AT&T conducted any analysis, study, or evaluation of the extent to which "more collocation space will be needed and traffic patterns within the network will change such that more local traffic will be routed to the ILEC's tandem switch" in South Carolina? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

228. State all facts and identify all documents that support the statement on page 23 of Mr. Van de Water's Rebuttal Testimony that existing [South Carolina] central office collocation space would need to be augmented in order to handle the surge of applications for new

collocation arrangements. In answering this Interrogatory, identify with specificity each BellSouth central office in South Carolina to which Mr. Van de Water is referring.

229. Referring to page 31 of the Rebuttal Testimony of Mark Van de Water, has AT&T conducted any analysis, study, or evaluation regarding expected "growth in volumes on BellSouth's tandem network" in South Carolina? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

230. Referring to page 32 of the Rebuttal Testimony of Mark Van de Water, has AT&T conducted any analysis, study, or evaluation regarding whether "BellSouth's tandem switches can handle the increased traffic load that they will be faced with" in South Carolina due to UNE-P to UNE-L migrations? If the answer to this Interrogatory is in the affirmative, describe with particularity the results of that analysis, study, or evaluation, and identify all documents referring or relating to such analysis, study, or evaluation.

231. State all facts and identify all documents that support the statement on page 28 of Mr. Van De Water's Rebuttal Testimony that BellSouth's trunks will experience trunk blockage as a result of the elimination of UNE-P.

232. Does AT&T contend that customer orders have been cancelled prior to conversion because of problems with BellSouth's coordinated hot cut process? If the answer to this Interrogatory is in the affirmative, state all facts and identify all documents that support this contention.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

22. Produce all documents identified in response to BellSouth's Second Set of Interrogatories and First Requests for Admission.

23. Produce all documents generated since January 1, 2000 referring or relating to the rates, cost, contribution, or margins associated with ADL service provided by AT&T to enterprise customers in South Carolina.
24. Produce all documents generated since January 1, 2000 referring or relating to the rates, cost, contribution, or margins associated with LNS service provided by AT&T to enterprise and small business customers in South Carolina, including, but not limited to, any differences in rates, cost, contribution, or margins that may exist depending upon whether the service is provisioned via UNE-L or UNE-P.
25. Produce all documents generated since January 1, 2000 referring or relating to the rates, cost, contribution, or margins associated with AIO service provided by AT&T to small business customers in South Carolina, including, but not limited to, any differences in rates, cost, contribution, or margins that may exist depending upon whether the service is provisioned via UNE-L or UNE-P.
26. Produce all documents generated since January 1, 2000 referring or relating to the product lines that AT&T offers to residential customers in South Carolina.
27. Referring to AT&T's response to BellSouth's First Set of Interrogatories, Item No. 70, produce all documents referring or relating to AT&T's decision to focus on "other modes of market entry" due in part to the cost and operational issues of hot cuts.
28. Produce all documents referring or relating to the DS0 Impairment Tools referenced in the Direct Testimony of Steven E. Turner, including, but not limited to, an electronic copy of the spreadsheet models relied upon by Mr. Turner.
30. Produce copies of all responses made by you to data requests, interrogatories, and requests for production of documents from any other party in Docket 2003-326-C.

31. Produce all documents created since January 1, 2000 referring or relating to the financial benefits to AT&T of providing local service using UNE-P instead of using UNE-L loops, collocation arrangements, and its own local switches.
32. Produce all documents created since January 1, 2000 referring or relating to the financial disadvantages to AT&T of providing local service using UNE-L loops, collocation arrangements, and its own local switches rather than UNE-P.
33. Produce all documents referring or relating to whether customers migrating qualifying service from an ILEC to AT&T tend to take the same services from AT&T, more services, or less services.

Respectfully submitted, this 16<sup>th</sup> day of March 2004.

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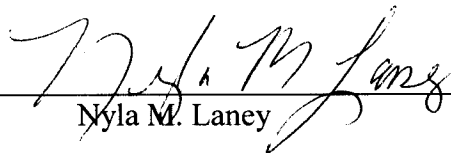
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